



**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the matter of	)	
	)	
Revision of Part 15 of the Commission's Rules to Permit	)	ET Docket No. 13-49
Unlicensed National Information Infrastructure (U-NII)	)	
Devices in the 5 GHz Band	)	
	)	

**COMMENTS OF THE  
SAFE AMERICA FOUNDATION**

The Safe America Foundation, a private, non-profit (501.c.3) licensed by the State of Georgia in 1994 and located at 2480 Sandy Plains Road, Marietta, Georgia, submits the following comments with respect to the above noted docket. The Foundation partners with corporate, governmental, public and private sector organizations and other non-profits to improve the safety awareness and preparedness of Americans nationwide.

Ensuring the safety of all Americans as they drive the streets and highways of our nation is of paramount importance to the Foundation and its several partners. To this end, since our founding, we have initiated a number of significant and innovative projects and programs designed to reduce traffic deaths and injuries in the State of Georgia and throughout the country. We are also dedicated to providing the best possible driver education experience for teen drivers, promoting emergency preparedness and injury prevention initiatives.

The Foundation is aware of the continuing need to provide all drivers with the most current and innovative vehicle technology that will help them to avoid crashes and injury. In this regard, it is our understanding that this proposed rule regarding Dedicated Short Range Communications Service (DSRC) would make spectrum in the 5.850-5.925 GHz band ("5.9 GHz Band") available for Unlicensed National Information Infrastructure ("U-NII") use. Our primary concern is that this proposed additional use of the spectrum could cause significant interference with current vehicle-to-vehicle ("V2V") and vehicle-to-infrastructure ("V2I") communication using 5.9 GHz band for DSRC. We believe that the DSRC must operate so that there will be virtually no interference with current and future vehicle communications technology. The prevention of traffic crashes, injuries and deaths must necessarily take priority over other uses of the communications band. Otherwise, other users must be able to show that they can "share" the band without creating harmful interference.

Be advised, therefore, that we are in support of the position advanced by the Alliance of Automobile Manufacturers regarding this proposed rulemaking and agree that the Commission should not allow unlicensed U-NII use of the 5.9 GHz band unless a set of rules and test procedures can be developed and shown, through bench and field testing, to protect 5.9 GHz DSRC systems from harmful interference.

Respectfully submitted,

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